

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC; TRIDENT ASSET
MANAGEMENT, INC.; and MICHAEL
DZIURGOT, individually and on behalf of a
putative class,

Plaintiffs,

vs.

ALEBRIJE ENTERTAINMENT, LLC;
CRAIG COLE; MATTHEW COLE;
GUSTAVO MONTAUDON; and JOHN
DOE NOS. 1–10,

Defendants.

Case No. 1:24-cv-20755

**DEFENDANT CRAIG COLE’S CERTIFICATE OF INTERESTED PERSONS AND
DISCLOSURE STATEMENT¹**

Defendant Craig Cole, pursuant to Federal Rule of Civil Procedure 7.1, hereby files this
Certificate of Interested Parties and Disclosure Statement.

I. INTERESTED PARTIES

The name of each person, attorney, association of persons, firm, law firm,
partnership, and corporation that has or may have an interest in the outcome of this action —
including subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal
entities related to any party in the case:

¹ Defendant Craig Cole files this certificate and statement as directed by the Court, but does so
without intending to waive or forfeit his Rule 12 defenses, including that this Court lacks personal
jurisdiction over him.

Craig Cole

Resident of Oregon
c/o Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Defendant

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Matthew Cole

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Attorney for Defendant Matthew Cole

Michael J. Harwin

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Attorney for Defendant Matthew Cole

AVR Group, LLC

c/o LOFTUS & EISENBERG, LTD.

161 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

Trident Asset Management, INC.

c/o LOFTUS & EISENBERG, LTD.

162 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

Michael Dziurgot

c/o LOFTUS & EISENBERG, LTD.

163 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

LOFTUS & EISENBERG, LTD.

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Counsel for Plaintiffs

Joseph McNulty

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Owner of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC

Alebrije Entertainment, LLC

c/o Law Office of Adam I. Skolnik, P.A.

1761 West Hillsboro Blvd., Suite 207 Deerfield Beach, FL 33442

Defendant

Gustavo Montaudon

c/o Law Office of Adam I. Skolnik, P.A. 1761

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Defendant

Adam I. Skolnick

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Michele Vives, Esq.

Court Appointed Receiver of 1inMM Capital, LLC
Katten Muchin Rosenman, LLP
525 W. Monroe St.
Chicago, IL
(312) 902-5200

II. RULE 7.1 DISCLOSURE STATEMENT

Defendant Craig Cole is a resident of Oregon and, as an individual, is not subject to corporate disclosure requirements.

Dated: May 22, 2024

Respectfully submitted,

**STUMPHAUZER KOLAYA
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By: /s/ Francis D. Murray
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Francis D. Murray
FRANCIS D. MURRAY